

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

ULKU ROWE,

Plaintiff,

-against-

GOOGLE LLC,

Defendant.

No. 1:19-cv-08655 (LGS)(GWG)

**[PROPOSED] ORDER GRANTING DEFENDANT'S  
RENEWED MOTION TO RETAIN DOCUMENTS UNDER SEAL**

AND NOW, this \_\_\_\_\_ day of \_\_\_\_\_, 2022, upon consideration of Defendant Google LLC's Renewed Motion to Retain Documents Under Seal, Memorandum of Law in Support, supporting Declaration, and any opposition and reply thereto, IT IS HEREBY ORDERED that:

1. Google's request to retain under seal portions Exhibit 1 to the Declaration of Sara B. Tomezsko ("Tomezsko Decl.") (ECF 143-1) offered in support of Google's Motion for Summary Judgment, is GRANTED;
2. Google's request to retain under seal portions Exhibit 3 to the Tomezsko Decl. (ECF 143-3) offered in support of Google's Motion for Summary Judgment, is GRANTED;
3. Google's request to retain under seal portions Exhibit 11 to the Tomezsko Decl. offered in support of Google's Motion for Summary Judgment, is GRANTED;
4. Google's request to retain under seal portions Exhibit 13 to the Tomezsko Decl. offered in support of Google's Motion for Summary Judgment, is GRANTED;

5. Google's request to retain under seal portions of email filed as Exhibit 20 to the Tomezsko Decl. offered in support of Google's Motion for Summary Judgment, is GRANTED;

6. Google's request to retain under seal portions of email correspondence filed as Exhibit 25 to the Tomezsko Decl. offered in support of Google's Motion for Summary Judgment, is GRANTED;

7. Google's request to retain under seal portions of the declaration of Google compensation analyst Chris Humez filed in support of Google's Motion for Summary Judgment, is GRANTED;

8. Google's request to retain under seal portions of the declaration of Will Grannis to be filed in support of Google's Motion for Summary Judgment, is GRANTED;

9. Google's request to retain under seal portions of Google's Reply In Further Support of Its Motion for Summary Judgment and Opposition to Plaintiff's Partial Motion for Summary Judgment, is GRANTED;

10. Google's request to retain under seal portions of Google's Reply in Support of Its Statement of Undisputed Facts, is GRANTED;

11. Google's request to retain under seal portions of Google's Response to Plaintiff's Statement of Undisputed Facts Pursuant to Local Civil Rule 56.1, is GRANTED;

12. Google's request to retain under seal portions of Exhibit 5 to the Supplemental Declaration of Sara B. Tomezsko in Opposition to Plaintiff's Motion for Summary Judgment and in Further Support of Google's Motion for Summary Judgment ("Supp. Tomezsko Decl.") is GRANTED;

13. Google's request to retain under seal portions of Exhibit 6 to the Supp. Tomezsko

Decl. is GRANTED;

14. Google's request to retain under portions of Exhibit 7 to the Supp. Tomezsko Decl. is GRANTED;

13. Google's request to retain under seal portions of Plaintiff's Memorandum of Law in Opposition to Defendant's Motion for Summary Judgment and in Support of Plaintiff's Cross-Motion for Summary Judgment is GRANTED;

14. Google's request to retain under seal portions of Plaintiff's Response to Google's Rule 56.1 Statement is GRANTED;

15. Google's request to retain under seal portions of Plaintiff's Affirmative Statement of Undisputed Facts Pursuant to Local Civil Rule 56.1 is GRANTED;

16. Google's request to retain under portions of the Declaration of Cara E. Greene is GRANTED;

17. Google's request to retain under portions of Exhibit 1 to the Jumper Decl. is GRANTED;

18. Google's request to retain under portions of Exhibit 8 to Jumper Decl. is GRANTED;

19. Google's request to retain under portions of Exhibit 9 to Jumper Decl. is GRANTED;

20. Google's request to retain under portions of Exhibit 10 to Jumper Decl. is GRANTED;

21. Google's request to retain under portions of Exhibit 18 to Jumper Decl. is

GRANTED;

22. Google's request to retain under portions of Exhibit 30 to Jumper Decl. is  
GRANTED;

23. Google's request to retain under portions of Exhibit 34 to Jumper Decl. is  
GRANTED;

24. Google's request to retain under portions of Exhibit 37 to Jumper Decl. is  
GRANTED;

25. Google's request to retain under portions of Exhibit 42 to Jumper Decl. is  
GRANTED;

26. Google's request to retain under portions of Exhibit 50 to Jumper Decl. is  
GRANTED;

27. Google's request to retain under portions of Exhibit 56 to Jumper Decl. is  
GRANTED;

28. Google's request to retain under portions of Exhibit 60 to Jumper Decl. is  
GRANTED;

29. Google's request to retain under portions of Exhibit 61 to Jumper Decl. is  
GRANTED;

30. Google's request to retain under portions of Exhibit 67 to Jumper Decl. is  
GRANTED;

31. Google's request to retain under portions of Exhibit 71 to Jumper Decl. is  
GRANTED;

32. Google's request to retain under portions of Exhibit 79 to Jumper Decl. is GRANTED;

33. Google's request to retain under portions of Exhibit 90 to Jumper Decl. is GRANTED;

34. Google's request to retain under portions of Exhibit 93 to Jumper Decl. is GRANTED;

35. Google's request to retain under portions of Exhibit 96 to Jumper Decl. is GRANTED;

IT IS SO ORDERED.

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Honorable Lorna G. Schofield  
United States District Judge